

HON. JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

VALVE CORPORATION,

Plaintiff,

v.

LEIGH ROTHSCHILD, ROTHSCHILD  
BROADCAST DISTRIBUTION SYSTEMS,  
LLC, DISPLAY TECHNOLOGIES, LLC,  
PATENT ASSET MANAGEMENT, LLC,  
MEYLER LEGAL, PLLC, AND SAMUEL  
MEYLER,

Defendants.

Case No. 2:23-cv-1016

**[PROPOSED] ORDER GRANTING  
PLAINTIFF VALVE CORPORATION'S  
MOTION TO COMPEL**

NOTE ON MOTION CALENDAR:  
**March 28, 2025**

Complaint Filed: 07/07/2023

ORAL ARGUMENT REQUESTED

Now pending before the Court is Plaintiff Valve Corporation's Motion to Compel. Having reviewed the Parties' LCR 37 Joint Submission, and all exhibits thereto, the Court finds good cause to grant the motion.

Accordingly, it is so ORDERED that within seven days of the issuance of this Order, Defendants Leigh Rothschild, Rothschild Broadcast Distribution Systems, LLC, Display Technologies, LLC, and Patent Asset Management, LLC, shall produce documents, communications, and things responsive to Valve's Requests for Production listed in Joint Exhibits A-D, including:

- All proposed and executed licenses to, assignments of, or other grant of rights to the '221 Patent or '723 Patent
- Documents sufficient to show all revenue, costs, and profits resulting from any license to, assignments of, or any other grant of rights to the '221 Patent or the '723 Patent
- Documents sufficient to show all revenue, profits, or income received by Leigh Rothschild from the corporate Defendants and their related companies
- Documents related to instances which Defendants have been subject to any penalties or sanctions, including those under 35 U.S.C. § 285, 28 U.S.C. § 1927, Federal Rule of Civil Procedure 11, or the court's inherent authority
- Documents relating to Defendants record-keeping policies and document management systems
- Documents relating to Defendants' analysis prior to sending the June 2023 Demand Letter to Valve
- Corporate organizational charts
- Documents showing persons with any ownership, control, or financial interest in Defendants PAM, RBDS, and Display Technologies
- Contracts between Rothschild and all corporate Defendants
- Contracts between Defendants' and any legal or non-legal entity related to enforcement of patents

- Documents showing all employees, contractors, or agents of corporate Defendants and their roles
- Demand letters sent by Defendants relating to the '221 Patent or '723 Patent

DATED: , 2025

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HON. JAMAL N. WHITEHEAD  
UNITED STATES DISTRICT JUDGE